

GTPC

GARY TSIRELMAN P.C.

ATTORNEYS & COUNSELORS AT LAW

129 LIVINGSTON STREET
SECOND & THIRD FLOORS
BROOKLYN, NY 11201
T: (718) 438-1200
gtsirelman@gtdj.com

Gary TSIRELMAN M.D.
Darya KLEIN
Stefan M. BELINFANTI

David M. GOTTLIEB
Vincent KU
Constance F. ROLAND

Susan M. BRICE
Ming ZENG
Sakrit SRIVASTAVA

April 23, 2025

Honorable Eric N. Vitaliano
United District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Roosevelt Road Re, Ltd. et al v. Liakas Law. P.C.* Docket No.: 1:25-cv-00300-ENV-RML

Dear Judge Vitaliano:

This firm represents Defendants Brooklyn Medical Practice, P.C., Sayeedus S. Salehin, M.D., North Shore Family Chiropractic P.C., Todd Lawrence Lebson, D.C., Unicorn Acupuncture, P.C., Dekun Wang L.ac, Big Apple Pain Management and Richard Apple, M.D. (collectively, “GTPC Defendants”) in the above-referenced matter. The GTPC Defendants submit this letter in response to ECF [82] pursuant to your Honor’s Individual Rule III.A. directing “*All parties* so served [to] file a letter response”.

GTPC Defendants endorse the basis for Pillsbury’s motion to dismiss and are planning to file our own pre-motion conference letter by May 7, 2025, the answer due date.

Respectfully,

_____-S-_____
Gary Tsirelman Esq.